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**IN THE UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In the Matter of:	:	Case No.18-17544-MBK
	:	Chapter 13
Rosa and Porfirio Davila, Jr.,	:	
	:	Hearing Date: 1/13/2021; 9:00am
	:	
Debtor(s)	:	NOTICE OF MOTION TO
	:	APPROVE FINANCING WITH LIBERTY
	:	HOME MORTGAGE CORPORATION FOR
	:	THE PURCHASE OF PROPERTY

**RESPONSES OR OBJECTIONS TO THIS MOTION SHOULD
BE FILED AT LEAST SEVEN (7) DAYS IN ADVANCE OF HEARING DATE**

TO: U.S. Trustee	Rosa and Porfirio Davila, Jr.,
One Newark Place	21 Eggerts Crossing Road
Suite 2100	Lawrence Township, NJ 08648
Newark, NJ 07102	
 Albert Russo	 Liberty Home Mortgage Corporation
Standing Chapter 13 Trustee	4401 Rockside Road, Suite 310
One AAA Drive Suite 101	Independence, Ohio 44131
Robbinsville, NJ 08691	

PLEASE TAKE NOTICE THAT THE UNDERSIGNED WILL APPLY TO:

Honorable: Chief Judge Michael B. Kaplan, U.S.B.J.
Date: January 13, 2021; 9:00am
Place: United States Courthouse, Clarkson S. Fisher, Federal Bldg.
402 East State Street, Ct. rm 8
Trenton, NJ 08608

RELIEF SOUGHT: For an Order:

- (1) Allowing Debtor to enter into financing with Liberty Home Mortgage Corp. for purchase of property located at 178 Nebraska Ave., Trenton, NJ
- (2) Holding that any escrow advances, corporate advances and all costs and attorney fees will be capitalized and added to the principal balance.
- (3) Holding that the Debtor's counsel shall be paid subject to the filing and allowance of supplemental fees.
- (4) The debtor will not receive any proceeds from this home loan financing.

GROUND(S): The grounds of the within motion are as set forth more fully in the Certification of the Debtor(s), annexed herein, and served filed together herewith.

BRIEF: Pursuant to D.N.J. L.B.R. 9013-2, the undersigned certifies that no novel issues Of law or fact are presented on this motion to necessitate the filing of a brief on this application.

Dated: December 10, 2020

By: /s/ Candyce I. Smith-Sklar
Candyce I. Smith-Sklar, Esq.
Attorney for Debtor(s), Rosa and Porfirio Davila, Jr.,

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